

CHAPTER 2

DETERMINING THE DIRECTION OF YOUR PROGRAM: ESTABLISHING POLICY, GOAL AND OBJECTIVES

INTRODUCTION

When you embark on a journey you usually have a reason for going, a destination and a specific plan for reaching your destination. Similarly, when planning a safety and health program, you first decide and put in writing your reason for establishing such a program. This is your policy. Next you decide where you want to end up. This is your goal. Then you map out the path toward your goal, the roads you will take and the vehicles you will use. These are your objectives. In this way you decide the direction of your program.

This chapter will help you begin your journey by explaining how to write and communicate your safety and health policy, and how to set and evaluate your goal and objectives. You will find many examples and worksheets to help you on your way.

POLICY

The hallmark of every successful safety and health program is top management's active and aggressive commitment. This commitment, in turn, influences the actions of the company's managers, supervisors and employees. It ultimately decides the effectiveness of the safety and health program in reducing or eliminating workplace injuries and illnesses.

The company states its commitment through a written and clearly communicated policy for workplace safety and health. This policy stresses the top priority of employee safety and health. The policy statement should be signed by the highest ranking company official on the site.

THE PRIORITY OF SAFETY AND HEALTH

A truly successful company places workplace safety and health ahead of such priorities as production, sales and quality control. If your policy statement makes this clear, it will be easier for employees to choose the correct action when a conflict arises between safety and health and other priorities. Here are some examples of policy statements that convey this belief:

- "People are our most important resource. Our company's principal responsibility is the safety and health of our employees.
- "Every employee is entitled to a safe and healthful place in which to work."
- "No job is so important it can't be done in a safe and healthful manner."
- "If it is not safe and healthful, we will not do it."

COMMUNICATING YOUR POLICY

To be effective, it is critical that your safety and health policy be communicated to all employees. You communicate your policy by word, action and example.

Communicate by Word. A new employee starts learning about the company's attitude toward safety and health from day one. By discussing job hazards and providing training in safe work procedures, both one-on-one and in group meetings, you tell the employee that safety and health have a high priority in your company. The supervisor's continuing emphasis on safety and health reinforces this positive company attitude.

In the smallest of companies, the safety and health policy may be easily explained and understood through spoken statements. However, for all companies, a carefully written policy statement is always recommended. A written statement:

- Clarifies policy,
- Creates consistency and continuity,
- Serves as a checkpoint whenever safety and health appear to conflict with production or other priorities, and
- Supports your supervisors in their enforcement of safety and health rules and safe work practices.

You will want to include the written statement in the information you give new employees. Be sure to post a signed policy statement on employee information bulletin boards. Another eye-catching way you can communicate your safety and health policy is by adding it to your company letterhead.

For assistance in writing a company or worksite safety and health policy, see “Policy Statement Worksheet”

Keep in mind that the written statement is not the policy. It is simply one way of communicating the policy. The real policy is your attitude toward your employees’ safety and health. You prove this attitude by your actions.

Communicate by Action. What you do – or fail to do – speaks louder than what you say. Show your concern for your employees’ safety and health by committing resources to the prevention and control of unsafe or unhealthful work or working conditions, to safe work practices and personal protective equipment (PPE) where needed, and to safety and health training. Whenever you display a willingness to put safety and health before short-term production goals, your actions forcefully and clearly proclaim your policy.

Communicate by Example. Top management, middle managers and supervisors express the company’s attitude toward workplace safety and health by their daily example. The rules and regulations that you post on bulletin boards and discuss at meetings are useless if management does not follow and enforce them. Set an example: Use PPE properly. Operate equipment safely. Hold supervisors accountable for their safety and health responsibilities. Run your business in a safe and healthful manner.

GOAL

By setting a safety and health policy, you have decided the reason for your journey: to establish an effective safety and health program. Now you must choose your destination, the point toward which your program strives. It is time to identify and set your program goal.

The policy statements discussed above all boil down to the same idea of desiring to provide work and working conditions that are not harmful to your employees. This is in keeping with the stated purpose of the Occupational Safety and Health Act of 1970 [29 U.S.C. 751 et seq.], “to assure so far as possible...safe and healthful working conditions” and to require that each employer “furnish to each of his employees employment and a place of employment which are free from recognized hazard....”

In moving from broad concept to more concrete goals, there are at least two basic goal types to consider: numerical and descriptive.

Numerical Goal. Numerical Goals have the advantage of being easy to measure. However, it is difficult to set a numerical goal that is both attainable and comprehensive enough to serve as destination for your journey.

- If you set a goal, for example, of zero hazards at any time, it may be so difficult to reach that you and your employees, will become disillusioned long before you have a chance to reach your destination.
- You could set a goal of a certain number of injuries. If you do so, however, you ignore both illnesses and those existing hazards that have not resulted in an injury yet.
- A goal of a certain number of injuries and illnesses may not be feasible. Illnesses often are difficult to recognize until long after employees' exposure to hazards that could have been prevented or better controlled. And as with the example above, this goal does not address hazards that have not yet resulted in injury or illness.

Descriptive Goal No numerical goal can be sufficiently inclusive and still attainable. Therefore, we recommend that you adopt a broad, descriptive safety and health goal: a comprehensive program that assess all existing and known potential hazards of your worksite and prevents or controls these hazards. Such a goal is neither as succinct nor as easily measurable as a numerical goal. But it is attainable. Further, this goal will be helpful in setting objectives. And it should not be difficult to evaluate objectives and program results against this goal. You may find another way of stating this concept, but we urge you to stay with this basic idea.

OBJECTIVES

You have established the reason behind your journey (policy) and your desired destination (goal). Now you are ready to decide on a travel route. The specific paths you will follow in your journey are your objectives. Setting objectives will make the difference between a haphazard trip and a carefully planned journey. Careful planning is much more likely to get you where you want to be.

Begin to develop meaningful objectives by answering these questions:

- Where do you want to be?
- Where are you now?
- What must be done to get from here to there?

When you set a goal, you decided where you wanted to be. The next step is to decide where you are now.

Where Are You Now? Before figuring out how to get from point A to point B, it helps to have a clear idea of the location of point A. This may seem absurdly obvious; but most of us, at one time or another, have jumped into a new project or taken off in a new direction without first assessing our present situation. Now is the time to gather as much information as possible about the current conditions at your workplace and about practices that are already a part of your safety and health program.

Is Your Safety and Health Program Complete? At a minimum, your program should reflect these four basic elements:

- Management Leadership and Employee Involvement,
- Worksite Analysis,
- Hazard Prevention and Control, and
- Safety and Health Training

These four elements are discussed in detail in Chapter 1 and in several other sources, including, OSHA, Department of Labor, "Safety and Health Program Management Guidelines" (54CFR 3908, January 26, 1989); and "The Handbook for Small Businesses", published by the safety consultation program.

In the remaining chapters we will focus on how to implement these elements. Which of the elements are missing from your workplace? Which need improvement? Consider developing objectives that will help you fill the gaps.

Get Everyone Involved. Here is an opportunity to get employees involved. Ask employees and supervisors to help you identify both the successful and unsuccessful parts of your program. Look at existing safety and health activities at your workplace. Which ones work well and which do not? Study your records (accidents, injury or illness data, workers' compensation rates) to see what they tell you.

Take a Good Look at Your Physical Surroundings. What obvious physical conditions currently exist that indicate OSHA violations or other hazards? In answering this question, you are beginning to identify your workplaces' problems and look ahead to their solution. If you come up with an excessive number of physical problems, get these fixed before your attempt to set objectives. Not only are you vulnerable to an OSHA inspection, you are also putting your employees at risk. Further, those safety and health problems that are obvious to you are undoubtedly obvious to your employees. Correct the problems and you demonstrate your interest in their safety and health.

What Must be Done to Get From Here to There. Now that you know where you stand, what do you need to get done? This is another opportunity to get employees involved in the development of your program. Allow them to participate in setting program objectives. Involvement helps create an atmosphere of acceptance and commitment to the safety and health effort.

Objectives are statements of results or performance. They are short-term positive steps along the way to your company's goal. Workplace objectives for safety and health are similar to those you set for other business functions such as sales or production. They identify WHAT? WHEN? And HOW MUCH? They do not include a justification for why they should be done; that is included in your policy statement. Nor do they contain a description of how they should be accomplished; that is included in your action plan.

Identify Your Objectives. Anything can become an objective -- from creating a safety and health committee to investigating accidents to developing an orientation program for new employees. You must decide which activities are most important to your program goal and which will help you create an effective overall safety and health program. The objectives you select should be consistent with your basic safety and health policy. And they should be part of the normal business of your company, rather than special projects added onto the normal workload.

Set Your Objectives. Objectives should be based on performance measure, that is, indicators that tell you whether you did or did not perform as expected. When setting objectives, keep the following points in mind:

- Objectives should relate to some part of your overall goal. Example: "Develop and carry out a program to train and license fork lift truck drivers." This objective relates to the part

of your goal to ensure that all employees understand the hazards and potential hazards of their work and how to protect themselves and others.

- Objectives should aim at specific areas of performance that can be measured or verified. Example: "Improve safety and health performance next month," is too general an objective to be useful. Better to say, "Make weekly inspections and make certain all hazard found are corrected within 24 hours."
- Objectives should be realistic and attainable but should still present a significant challenge. Example: "Reduce recordable injuries in the upcoming year by 100 percent." This objective may be unattainable because of the extent and complexity of the measures needed to prevent all injuries. An objective well beyond reach can soon create a defeatist attitude among all those working toward its achievement. On the other hand, "Reduce recordable injuries by 5 percent in the next year," can destroy employee interest by presenting too small of a challenge.
- When setting objectives, solicit ideas from as wide a range of employees as practical. Your ideas already may strongly influence your supervisors. Nonetheless, you will find that safety and health objectives are most effective when you discuss them beforehand with your supervisors or employees. At least secure their agreement or cooperation. People who feel they have helped set an objective will be most motivated to achieve it.
- Objectives should be understood by all those directly involved. Use terms that have a clear meaning to all concerned supervisors and employees. Leave no doubt about what is to be accomplished. Example: "Find out the cause(s) of all accidents and incidents," may be too abstract to be understood (and therefore accomplished) by those with responsibility. Be clear and specific: "Investigate all accidents and incidents at once to determine all contributing causes, and take corrective action within 24 hours of completing the investigation."
- Objectives need to be achievable with available resources. An objective that requires a large outlay of money or an increase in staff during a budget crunch probably won't be achieved. Setting such an objective is a waste of time and effort. However, you need not discard this objective. Postpone it. For the present, create an intermediate objective of working to produce the needed resources. Remember, you travel toward your goal one step at a time. The objective you achieve this year may enable you to tackle a larger objective next year.

Write Your Objectives. Put each objective in writing. That gives it more importance. It also helps you track your position at any time and thereby determine how far along you are in accomplishing the assignment.

Explain in concrete terms what is to be achieved, to what degree, and by when. Be very specific in your wording, and focus on performance. You may also want to include a statement showing the maximum amount of time or money available to accomplish the objective.

Here are some examples of safety and health program objectives:

- Conduct weekly inspections with emphasis on good housekeeping, proper use of protective equipment, condition of critical parts of equipment and preventive maintenance.
- Find out the cause(s) of any accident within 24 hours.
- Eliminate any hazards(s) identified during accident investigations and weekly planned inspections within 24 hours whenever possible.
- Complete one job safety analysis each month in each department, with follow-up revision of safe work procedures and employee training by the following month.
- Hold and evaluate emergency drills for tornadoes every six months and a joint fire drill/evacuation with local emergency organizations every year

Keep copies of the written objectives and use them in discussions with your supervisors and employees. Be sure your people understand their assigned responsibilities. Stress that they will be held accountable for these responsibilities. For further guidance, see Chapters 5 and 6.

Is It Working? Review your objectives periodically.

- Are you getting the desired performance from supervisors and employees?
- Are objectives being achieved?
- Are the results moving you toward your goal?

Any program or activity in which you invest time and resources on a continuing basis should prove its worth. If an objective has been achieved, but there continue to be too many injuries, too many close calls, too many unsafe acts, or no improvement in conditions, then different or additional objectives are needed.

The worksheets in Appendices 2-2 and 2-3 provide a model for you to use in writing up your safety and health program objectives. Chapter 12 will help you evaluate the effectiveness of these objectives.

SUMMARY

Your safety and health program deserves to be carefully thought out and directed. The first step is to write and communicate your safety and health policy. This states your reasons for the program and your commitment to the health and safety of your employees. You express this policy by word (both spoken and written), by action and by example.

The second step is to set and communicate a goal for your program. This is like choosing the destination for a journey. It requires a determination of where you want to be. Your goal can be expressed either numerically or descriptively. There are advantages and difficulties with both, but we have found that a comprehensive and yet attainable goal is most likely to be descriptive. We recommend the following goal:

A comprehensive program to assess all existing hazards and known potential hazards of the workplace and to prevent or control those hazards.

The third step in determining the direction of your safety and health program is to map out your route by setting program objectives. To do this, you first need to know where you are: take a close look at the current state of your safety and health program and your workplace. What more is needed to protect your workers' safety and health?

The objectives that you set should be specific, measurable actions that move you toward your goal. They must be attainable and yet challenging. Use the clearest possible wording so that your supervisors and employees understand their responsibility and accountability. Once your program is set in motion, review these objectives periodically. Is everyone performing as expected? Are the results being achieved worth the time and resources being expended? Are you moving closer to your goal?

The success of this effort depends on the commitment of top management and the participation of your workforce. Involve your supervisors and employees in the setting of program objective. The greater their involvement in mapping the route to safety and health, the greater will be their acceptance of the challenges and responsibilities of their journey.

APPENDIX 2-1

POLICY STATEMENT WORKSHEET

Policy statements can vary in length and content. Some contain policy only. Others include company philosophy. Still, others spell out rules and procedures. Some policy statements will cover items such as specific assignment of responsibility, delegation of authority, description of duties, safety and health rules, and establishment of a safety committee. While some companies may want to include additional items in the policy statement, we believe it is usually best to leave these details for later discussion.

This worksheet is designed to help you develop your safety and health policy statement. It contains examples of specific statements often found in safety and health policies. These are examples only, but they may give you ideas for a policy statement that expresses your style, your attitudes and your values.

INTRODUCTORY STATEMENT

The written policy statement generally starts with a clear, simple expression of your concern for and attitude about employee safety and health. Examples of introductions of policy statements include:

- This company considers no phase of its operation or administration more important than safety and health. We will provide and maintain safe and healthful working conditions, and we will establish and insist on safe work methods and practices always.
- Accident prevention is a primary job of management, and management is responsible for establishing safe and healthful working conditions.
- This company has always believed that our employees are our most important asset. We will always place a high priority on efficient operations and on the safety and health of employees.
- The company will, at all times and at every level of management, attempt to provide and maintain a safe and healthful working environment for all employees. All safety and health protection programs are aimed at preventing accidents and exposure to harmful atmospheric contaminants.
- All members of management and all employees must make safety and health protection a part of their daily and hourly concern.

PURPOSE/PHILOSOPHY

An effective safety and health program should have a stated purpose or philosophy. This is included in the written policy statement so that both you and your employees are reminded of the purpose and value of the program. You may wish to incorporate into your policy such statements as:

- We have established our safety and health program to eliminate employee work-related injuries and illnesses. We expect it to improve operations and reduce personal and financial losses.
- Safety and health protection must be an integral part of all operations including planning, procurement, development, production, administration, sales and transportation. Accidents and health hazard exposures have no place in our company.
- We want to make our safety and health protection efforts so successful that we make elimination of accidents, injuries and illnesses a way of life.
- We aim to resolve safety and health problems through prevention.
- We will involve both management and employees in planning, developing, and implementing safety and health protection.

MANAGEMENT RESPONSIBILITIES

Your safety and health action plan should describe in detail who is to develop the program and make it work, as well as who is assigned specific responsibilities, duties and authority. The policy statement may include a summary of these responsibilities. For example:

- Each level of management must reflect an interest in company safety and health and must set a good example by complying with company rules for safety and health protection. Management interest must be vocal, visible and continuous from top management to departmental supervisors.
- The company management is responsible for developing an effective safety and health program.
- Plant superintendents are responsible for maintaining safe and healthful working conditions and practices in areas under their jurisdiction.
- Department heads and supervisors are responsible for preventing accidents and health hazard exposures in their departments.
- Supervisors are responsible for preventing accidents and health hazard exposures on their lines.
- Supervisors will be accountable for the safety and health of all employees working under their supervision.
- The Safety Director has the authority and responsibility to provide guidance to supervisors and to help them prevent accidents and exposure to health hazards.
- Management representatives who have been assigned safety and health responsibilities will be held accountable for meeting those responsibilities.

EMPLOYEE RESPONSIBILITIES

Many companies acknowledge the vital role of their employees in the operation of a successful safety and health program by summarizing employee roles and contributions in the policy statement. Here are some examples:

- All employees are expected to follow safe working practices, obey rules and regulations, and work in a way that maintains the high safety and health standards developed and sanctioned by the company.
- All employees are expected to give full support to safety and health program activities.
- Every employee must observe established safety and health regulations and practices, including the use of personal protective equipment.
- All employees are expected to take an active interest in the safety and health program, participate in program activities, and abide by the rules and regulations of the company.
- All employees must recognize they have a responsibility and must take necessary action to prevent injuries and illnesses. Their performance in this regard will be measured along with general performance. They must also understand that their achievements and conformance to set policies will be part of their general performance evaluation.

CLOSING STATEMENT

The closing statement is often a reaffirmation of your commitment to provide a safe and healthful workplace. It also may appeal for the cooperation of all company employees in support of the safety and health program.

- I urge all employees to make this safety and health program an integral part of their daily operation.
- By accepting mutual responsibility to operate safely, we all will contribute to the well being of one another and, consequently, the company.
- We must be so successful in our efforts that total elimination of accidents, injuries and illnesses becomes a way of life.

SUMMARY

Generally a written safety and health policy statement will run six to 12 sentences in length. It should include the five elements listed above: an introductory statement, a statement of the purpose or philosophy of the policy, a summary of management responsibilities, a summary of employee responsibilities, and a closing statement.

APPENDIX 2-2

SAMPLE SAFETY AND HEALTH POLICY STATEMENT

This company believes that our employees are our most important asset. We always place a priority on efficient operations which includes the safety and health of employees.

Safety and health issues shall be an integral part of all operations including planning, procurement, development, production, administration, sales and transportation. Accidents have no place in our company.

We will work consistently to maintain safe and healthful working conditions, to follow proper operating practices and procedures designed to prevent injury, illnesses, and to comply with Federal, State, local and company safety and health regulations.

Each level of management must reflect an interest in company safety and health objectives and is required to set a good example by always observing the rules as a part of the normal work routine. Management interest will be vocal, visible and continuous, from company managers to departmental supervisors.

All employees are expected to participate in the safety managers function, follow safe working practices, obey rules and regulations, and work in a way that maintains the high safety and health policies developed and sanctioned by the company.

We urge all employees to make our safety and health program an integral part of their daily operation. Then the total elimination of accidents and injuries will become not just an objective, but a way of life.

—

Chief Executive Officer

APPENDIX 2-3**SAMPLE WORKSHEET RELATING OBJECTIVE TO GOAL**

GOAL: PROVIDE A COMPREHENSIVE PROGRAM TO ASSESS AND PREVENT OR CONTROL ALL HAZARDS

OBJECTIVE: INCREASE EMPLOYEE INVOLVEMENT IN PLANT HAZARD ASSESSMENT AND CONTROL

ACTIVITY	PERSON IN CHARGE	EVALUATE TARGET DATE	OBJECTIVE AND RESULTS
1. Conduct monthly an all employee meeting to discuss current safety and health concerns.	Manager	Begin by June	Annually
2. Establish a joint management/employee committee for inspections and accident investigations.	Manager	Committee functioning by September 30	Annually
3. Provide accident investigation training to safety committee members.	Safety Supervisor	Training completed by October 30	Track progress
4. Eliminate any hazard(s) identified during planned inspections and accident investigations within 24 hours whenever possible.	Manager	November 30	Annually
5. Provide hazard recognition training to the safety committee members.	Safety Supervisor	Training completed by December 31	Track monthly progress
6. Hold and evaluate a joint fire drill/evacuation with local emergency organization every year.	Manager	December 31	Annually

APPENDIX 2-4

GUIDELINES FOR WRITING OBJECTIVES

In general, a well-formulated objective:

- Starts with an action verb.
- Specifies a single key result to be accomplished.
- Specifies a target date for its accomplishment.
- Is specific and quantitative; therefore, is measurable and verifiable.
- Specifies the what and when; avoids the why and how.
- Relates directly to the accountable manager's role in the organization.
- Is readily understandable by those who will be contributing to its attainment.
- Is realistic and attainable but represents a significant challenge.
- Provides maximum payoff on the required investment of time and resources when compared with other objective being considered.
- Is consistent with available or anticipated resources.
- Is consistent with basic organization policies and practices.